UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

PEGGY ROIF ROTSTAIN, et al., on behalf of themselves and all others similarly situated,

Plaintiffs, : Case No. 3:09-CV-02384-N

-against-

TRUSTMARK NATIONAL BANK, HSBC BANK PLC, THE TORONTO-DOMINION BANK, INDEPENDENT BANK F/K/A BANK OF HOUSTON, SG PRIVATE BANKING (SUISSE) S.A., and BLAISE FRIEDLI,

Defendants. :

DEFENDANTS' MOTION TO COORDINATE CERTAIN CLASS CERTIFICATION ISSUES

Defendants The Toronto-Dominion Bank, Trustmark National Bank, HSBC Bank plc, Independent Bank, successor by merger to Bank of Houston, Société Générale Private Banking (Suisse) S.A., and Blaise Friedli (collectively, "Bank Defendants") hereby move to coordinate certain class certification issues in this putative class action (the "Bank Action") with three other putative class actions in the multidistrict litigation captioned *In re Stanford Entities Sec. Litig.*, No. 3:09-md-02099-N-BG ("Motion"). The three other putative class actions proposed for coordination with the Bank Action are as follows: (i) *Troice v. Proskauer Rose LLP*, No. 3:09-cv-01600-N-BG (N.D. Tex.), (ii) *Troice v. Willis of Colorado Inc.*, No. 3:09-cv-01274-N-BG (N.D. Tex.), and (iii) *Turk v. Pershing LLC*, No. 3:09-cv-02199-N-BG (N.D. Tex.).

¹ HSBC Bank plc, Société Générale Private Banking (Suisse) S.A., and Blaise Friedli submit this motion subject to, and without waiving, the defense that they are not subject to personal jurisdiction in Texas.

For the reasons set forth in the accompanying Memorandum of Law filed on behalf of the Bank Defendants, the Bank Defendants respectfully request that the Court grant this Motion.

Dated: July 28, 2015 Respectfully submitted,

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CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7.1 of the Local Rules for the U.S. District Court for the Northern District of Texas, on July 21, 2015, counsel for the Bank Defendants conferred with James Swanson at Fishman Haygood, L.L.P., counsel for class plaintiffs, and Peter Morgenstern at Butzel Long, P.C., counsel for the Official Stanford Investors Committee and the putative class, in a good-faith attempt to resolve this matter by agreement. On July 27, 2015, Mr. Swanson and Mr. Morgenstern indicated that they take no position with respect to the relief requested herein.

In July 2015, counsel for the Bank Defendants also conferred with counsel for plaintiffs and defendants in *Troice v. Proskauer Rose LLP*, No. 3:09-cv-01600-N-BG, counsel for plaintiffs and defendants in *Troice v. Willis of Colorado Inc.*, No. 3:09-cv-01274-N-BG, and counsel for plaintiffs and defendants in *Turk v. Pershing LLC*, No. 3:09-cv-02199-N-BG, to advise them of this motion. Counsel for plaintiffs in these three actions have indicated that they oppose the relief requested herein. Counsel for defendants in these three actions have indicated that they take no position with respect to the relief requested herein.

/s/ Rodney Acker	
Rodney Acker	

CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2015, the foregoing document was filed with the Court's CM/ECF system, which has generated and delivered electronic notices of filing to all counsel of record who have consented to electronic service.

/s/ Rodney Acker	
Rodney Acker	